

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

-against-

IRIS CAPITAL SECURITIES S.A.L., ANTOINE
KHALIFE, and ONE OR MORE UNKNOWN
PURCHASERS OF SECURITIES OF TELVENT
GIT, S.A.,

Defendants.

1:11-CV-03794 (TPG)

ECF CASE

**NOTICE OF CROSS-MOTION
FOR SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that, upon the Declaration of Antoine Khalife, dated October 19, 2012 and the exhibits annexed thereto, the Declaration of Paul Batista, Esq., dated October 19, 2012, and the exhibits annexed thereto, the accompanying memorandum of law, and all prior pleadings and proceedings herein, Defendants Iris Capital Securities S.A.L. and Antoine Khalife, by their counsel Schlam Stone & Dolan LLP, will move this Court, at the United States Courthouse, Room 26B, 500 Pearl Street New York, New York 10007, as soon as counsel may be heard, for an Order granting summary judgment to Defendants, dismissing the complaint of Plaintiff the Securities and Exchange Commission with prejudice.

Dated: New York, New York
October 19, 2012

SCHLAM STONE & DOLAN LLP

By: /s/ Paul Batista
Paul Batista
Jeffrey M. Eilender
Bradley J. Nash
Raffi Melkonian
26 Broadway
New York, New York 10004
Telephone: (212) 344-5400
Facsimile: (212) 344-7677

*Attorneys for Defendants Iris Capital Securities
S.A.L. and Antoine Khalife*

To: Paul W. Kisslinger, Esq.
U.S. Securities and Exchange Commission
100 F Street, N.E.
Washington, DC 20549
Telephone: 202-551-4953
Fax: 202-772-9631

Attorney for Plaintiff